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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	CASE NO.	CASE NO. CR 18-577 CRB
)		
Plaintiff,)	STIPULATION REGARDING BUSINESS	
)	RECORDS OF CHARLES SCHWAB	
v.)		
)		
MICHAEL RICHARD LYNCH and)		
STEPHEN KEITH CHAMBERLAIN,)		
)		
Defendants.)		

The United States and Defendants Michael Richard Lynch and Stephen Keith Chamberlain hereby stipulate that the following documents are (1) business records pursuant to Federal Rule of Evidence 803(6) because they were made at or near the time by someone with knowledge; kept in the course of regularly conducted business; and made as part of a regular business activity; and (2) are authentic pursuant to Federal Rule of Evidence 901, 902(11), 902(13), and/or 902(14).

Exhibit	Description	Custodian
2728	Charles Schwab Brokerage Account of Nigel John Upton, for statement period August 1 – 31, 2011	Charles Schwab
2733	Account Statements, Nigel Upton showing trading in HP (Raymond James and Assoc)	Charles Schwab

STIP RE BUSINESS RECORDS (SCHWAB)
CASE NO. CR 18-577 CRB

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

MICHAEL RICHARD LYNCH and
STEPHEN KEITH CHAMBERLAIN,

Defendants.

CASE NO. CASE NO. CR 18-577 CRB

STIPULATION REGARDING BUSINESS RECORDS OF CHARLES SCHWAB

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1 DATED: March 14, 2024

Respectfully submitted,

2 PATRICK D. ROBBINS
3 Attorney for the United States,
4 Acting Under Authority Conferred by
5 28 U.S.C. § 515

6 /s/

7 ROBERT S. LEACH
8 ADAM A. REEVES
9 KRISTINA N. GREEN
10 ZACHARY G.F. ABRAHAMSON
11 Assistant United States Attorneys

12 DATED: March 14, 2024

CLIFFORD CHANCE US LLP

13 /s/

14 CHRISTOPHER J. MORVILLO
15 Attorneys for Defendant Michael Lynch

16 DATED: March 14, 2024

17 BIRD, MARELLA, BOXER, WOLPERT,
18 NESSIM, DROOKS, LINCENBERG, &
19 RHOW, P.C.

20 /s/

21 GARY S. LINCENBERG
22 Attorneys for Defendant Stephen
23 Chamberlain